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9 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 MARIYA CHERNYKH, et al.,
-1) MARIYA CHERNYKH

17 Defendants.
18
19

No. ED CR 16-292-JGB-1

STIPULATION TO CONTINUE
SENTENCING HEARING

SENTENCING DATE: March 29, 2021

[PROPOSED] SENTENCING DATE:
May 17, 2021

20 Plaintiff United States of America, by and through its counsel
21 of record, and defendant MARIYA CHERNYKH ("defendant"), by and
22 through her counsel of record, hereby stipulate as follows:

- 23 1. The Indictment in this case was filed on April 27, 2016.
24 2. On January 26, 2017, defendant pled guilty pursuant to a
25 written plea agreement with the government to violating 18 U.S.C.
26 § 371: Conspiracy, 18 U.S.C. § 1621: Perjury, and 18 U.S.C.
27 § 1001(a)(2): Material False Statements. The Court originally set
28 defendant's sentencing for November 20, 2017, and, at the request of

1 the parties, continued it to March 29, 2021. Defendant is out of
2 custody on bond pending sentencing.

3 3. By this stipulation, the parties respectfully request to
4 continue the sentencing hearing from March 29, 2021, to May 17, 2021.

5 4. Defendant needs additional time to prepare her written
6 sentencing position and believes it is in her best interest to seek a
7 continuance.

8 5. Additionally, defense counsel requests the continuance
9 based the ongoing COVID-19 pandemic and the expectation that counsel
10 and others may be vaccinated from COVID-19 by the requested continued
11 sentencing date.

12 6. The government does not object to and concurs in this
13 request.

14 IT IS SO STIPULATED.

15 Dated: March 16, 2021

Respectfully submitted,

16 TRACY L. WILKISON
17 Acting United States Attorney,

18 CHRISTOPHER D. GRIGG
19 Assistant United States Attorney
Chief, National Security Division

20 /s/ Melanie Sartoris
21 MELANIE SARTORIS
Assistant United States Attorney

22 Attorney for Plaintiff
23 UNITED STATES OF AMERICA

24 Dated: March 16, 2021

/s/ by electronic authorization
25 DAVID J.P. KALOYANIDES

26 Attorney for Defendant
27 MARIYA CHERNYKH
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